

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE BAYOU HEDGE FUND INVESTMENT
LITIGATION

06 MD 1755 (CM)

THIS DOCUMENT RELATES TO:

TRAVIS CO. J.V.
ROGER HILL, SR. and
CHRISTOPHER HILL,

Plaintiffs,

7:06-CV-11328-CM

vs.

HENNESSEE GROUP LLC,
ELIZABETH LEE HENNESSEE
And CHARLES GRADANTE

Defendants.

ORAL ARGUMENT REQUESTED

Electronically Filed

TO: Marvin Pipkin
Pipkin, Oliver & Bradley, LLP
1020 N.E. Loop 410, Suite 505
San Antonio, Texas 78209
Attorneys for Plaintiffs Travis Co. J.V.,
Roger Hill, Sr. and Christopher Hill

SIRS:

PLEASE TAKE NOTICE that on the Declarations of Charles Gradante and Matthew Wolper, the documents attached thereto and accompanying Brief, the undersigned, attorneys for Defendants, Hennessee Group LLC, Charles Gradante and E. Lee Hennessee, will move this Court before the Honorable Colleen McMahon, U.S.D.J. at the United States District Court for

the Southern District of New York located at 300 Quarropas Street, White Plains, New York, at a time and date convenient to the Court, for an Order compelling arbitration of all of Plaintiffs' claims against the Defendants pursuant to Section 4 of the Federal Arbitration Act ("FAA") and staying the litigation of Plaintiffs' claims against Defendants pending the completion of the arbitration proceeding pursuant to Section 3 of the FAA.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested.

Dated: November 8th, 2006

BRESSLER, AMERY & ROSS, P.C.
2801 SW 149th Avenue, Suite 300
Miramar, Florida 33027
(954) 499-7979
(954)-499-7969
mwolper@bressler.com
Attorneys for Defendants
Hennessee Group LLC,
Elizabeth Lee Hennessee and
Charles Gradante

By: _____/S/
Bennett Falk (BF 5539)
Matthew Wolper (MW 8835)
Matthew Plant (MP 0328)

CERTIFICATE OF SERVICE

I hereby certify that on November 8th, 2006, a copy of the *Notice of Motion to Stay This Proceeding And Compel Arbitration of Plaintiff's Claims* was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/S/
Bennett Falk (BF 5539)